

7-3-13

Untitled

THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED

JUL 08 2013

David J. Bradley, Clerk of Court

Motion to convert ATP OIL AND GAS Corporation to chapter 7

In re:	§	
ATP Oil & Gas Corporation,	§	Chapter 11
Debtor	§	Case No.: 12-36187
	§	Hon. Marvin Isgur
	§	

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE: RE: ATP Oil & Gas

Your Honor I am requesting you to convert this case to a chapter 7. I am a 2nd Lien holder and part of interest I feel it would be in the best interest of the estate if this case was converted to a chapter 7. Currently i stand to receive zero for my claims and the Dip lenders will receive many times over there claim. The atp Titan alone cost 800 million to build. If the sale is approved or not the debtor will convert to a chapter 7. I feel a Trustee will give all partys a fare share as the debtor seems to be tainted with there promise of 10% of the new company from ther DIP lnders.

And or i am also requesting valuation hearings on the assets. at the very least the dip lenders should bid there entire claim on the assets and not a partial amount.

Your Honor I am not a lawyer. I also am not sure if this conversion to chapter 7 is proper how I sent it to the court Procedurally.

I only ask that you give me a fare chance at some type of recovery.

Sincerely, Roman Gelsi
2139 East chestnut ave unit 2
Vineland NJ 08361

